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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KALMAN ISAACS, Individually and on behalf of  
all others similarly situated,

Plaintiff,

vs.

ELON MUSK and TESLA, INC.,

Defendants.

Case No.: 3:18-cv-04865-EMC

**[PROPOSED] ORDER  
CONSOLIDATING RELATED  
ACTIONS, APPOINTING LEAD  
PLAINTIFF AND COUNSEL**

**CLASS ACTION**

WILLIAM CHAMBERLAIN, Individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

TESLA INC., and ELON MUSK,

Defendants.

Case No.: 3:18-cv-04876-EMC

**CLASS ACTION**

1 JOHN YEAGER, Individually and on behalf of all  
2 others similarly situated,

3 Plaintiff,

4 vs.

5 TESLA, INC. and ELON MUSK,

6 Defendants.  
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Case No.: 3:18-cv-04912-EMC

**CLASS ACTION**

11 CARLOS MAIA, Individually and on behalf of all  
12 others similarly situated,

13 Plaintiff,

14 vs.

15 TESLA, INC. and ELON R. MUSK,

16 Defendants.  
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Case No.: 3:18-cv-04939-EMC

**CLASS ACTION**

1 KEWAL DUA, Individually and on behalf of all  
2 others similarly situated,

3 Plaintiff,

4 vs.

5 TESLA, INC. and ELON MUSK,

6 Defendants.  
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Case No.: 4:18-cv-04948-HSG

**CLASS ACTION**

11 JOSHUA HORWITZ, Individually and on behalf  
12 of all others similarly situated,

13 Plaintiff,

14 vs.

15 TESLA, INC. and ELON R. MUSK,

16 Defendants.  
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Case No.: 3:18-CV-05258-JSW

**CLASS ACTION**

1 ANDREW E. LEFT, Individually and on behalf of  
2 all others similarly situated,

3 Plaintiff,

4 vs.

5 TESLA, INC., AND ELON R. MUSK,

6 Defendants.  
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Case No.: 3:18-CV-05463-EMC

**CLASS ACTION**

11 ZHI XING FAN, Individually and on behalf of  
12 others similarly situated,

13 Plaintiff,

14 vs.

15 TESLA, INC. and ELON R. MUSK,

16 Defendants.  
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Case No.: 4:18-cv-05470-YGR

**CLASS ACTION**

**Upon good cause shown, IT IS HEREBY ORDERED THAT:**

- I. The Motion of Jiri Kulik, Jason Han, Esmaeil Riahi, Deepak Mehta, and Raghunath Nama (collectively, the “Tesla Investor Group”) to Consolidate Related Actions, for Appointment as Lead Plaintiff and Approval of Counsel is granted.
- II. The above-captioned actions are hereby consolidated pursuant to Federal Rule of Civil Procedure 42(a) for all purposes.
- III. The Tesla Investor Group is hereby appointed as Lead Plaintiff for the proposed Class pursuant to 15 U.S.C. § 78u-4, as amended by the Private Securities Litigation Reform Act of 1995.
- IV. Bernstein Liebhard LLP is hereby appointed as Lead Counsel and Hedin Hall LLP is hereby appointed as Liaison Counsel for the proposed Class.

SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2018

\_\_\_\_\_  
The Honorable Edward M. Chen  
United States District Judge